Regarding RM-10740, I see that once again, a few disgruntled individuals are attempting to take away age-old privileges from the many. As a licensed Amateur Radio Operator for over 48 years, I have seen these kinds of attempts more than once. They have been defeated in the past, and should be again now.

Most Hams do not run excessive band width as defined under current rules. A few, on both AM and SSB, do exhibit this problem, frequently due to transmitter misadjustment. In a rare number of cases, operators deliberately run their transmitters into distortion, overmodulation, and excessive bandwidth. Such cases have, for the most part, been taken care of through official FCC enforcement, the Official Observer service, or through self-policing by the Hams themselves.

Ham Radio, like our nation, is a diverse group. Many interests co-exist in this service, including routine and emergency traffic handling, DXing, rag-chewing, building, CW, AM, FM, FSK, ATV, SSB and other modes and activities. Recently, collection and restoration of vintage radios has become very popular as well. This vintage gear is proudly operated in the Amateur Bands, just as vintage cars are driven on the public highways. Both sometimes take up a little more room, either spatially or temporally, than state-of-the-art equipment.

But in my experience, efficiency of spectrum utilization has not been a compelling concern in this voluntary, unpaid, leisure-time service of ours. To place rigorous restrictions on bandwidth would be to reduce diversity, experimentation, learning, technical development, and yes, general enjoyment of our activities. The word, AMATEUR, means "for the love of it." We do not engage in Amateur Radio for profit or as a work activity, but because we love what we do. If RM-10740 should take effect, the whole spirit of this service would change as we would approach radio operation with the grim resolve of unpaid work. Many of us would find other pastimes that give us more pleasure. Must we be made to suffer from the rationalization of Ham Radio? Enough of life is already immersed in rationality, as the sociologist, Max Weber observed almost a century ago.

Furthermore, if such efficiency of spectrum utilization becomes a prime concern, then we would be living a contradiction. The top code speed requirement today is 5 wpm in this service, with one class of license requiring no code at all. There is even talk of eliminating the code requirement completely in Amateur Radio. Yet, at the same time that there is less and less encouragement for using CW, which is by far the most efficient of modes for spectrum utilization, we hear another hue and cry for dejure restrictions on bandwidth. If we are truly concerned about efficiency of spectrum utilization, we should be encouraging, not discouraging, the wide-spread use of CW. Perhaps it is because we discourage CW that we now suffer demands of bandwidth restrictions on phone. We have here a prime example of a dysfunctional and unintended consequence.

In sum, I am against this proposal for rulemaking, which I find unnecessary, inconsistent, and counter to the diversity that our

nation emphasizes. I find it a threat to the very foundation of Amateur Radio -- an activity that is engaged in for its own sake -- for the love of it. Pease don't let nay-sayers turn AMATEUR Radio into PROFESSIONAL Radio, with all the problems that would bring.

Respectfully submitted,

Herbert J. Ulrich, Jr., Ph.D, K2VH